

REMARKS

This application has been reviewed in light of the Office Action dated April 4, 2003. Claims 1-5 and 8-12 remain in this application. Claims 1, 2, 10 and 11 have been amended to define more clearly what Applicant regards as prior art. Claim 1 is in independent form. Favorable reconsideration is requested.

Claims 1-5 and 8-12 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent 6,236,820 B1 (Nakazato et al.).

The general nature of the present invention has been adequately discussed previously, as has the prior art applied against the claims, and it is not deemed necessary to repeat that discussion in full.

The aspect of the invention set forth in Claim 1 is an image forming apparatus that comprises an image bearing member and a plurality of optical boxes, each of which optical boxes containing at least a light source, deflecting means for deflecting light emitted from the light source, and a lens arranged to image the deflected light onto the image bearing member. Claim 1 also recites that one of the plurality of optical boxes is stacked directly on, and in contact with, a second one of the optical boxes.

This last-mentioned feature is an important one by virtue of which it is possible to reduce misalignment between the optical boxes. As is explained in the specification, ensuring proper alignment has the benefit of making it easier to ensure that the images formed using the apparatus are of high quality.

*Nakazato '820* relates to a system having discloses optical writing means (104K-104Y) between which flat structural members 202 and base members (328K-328Y)

are provided. Contrary to the assertion in the Office Action, Applicants strongly urge that nothing in *Nakazato '820* discloses or suggests optical writing means directly stacked on top of each other and in contact with each other, as recited in Claim 1. In each of the arrangements shown in *Nakazato '820*, including those specifically cited in the Office Action, Applicant is unable to find any hint that the optical writing means are in contact with each other. To the contrary, it appears rather that the intervening elements 202 and 328 completely prevent any such contact. In these arrangements, it is not seen how any improvement over the conventional approach in respect of alignment is to be obtained. Rather, it seems that in the *Nakazato '820* arrangements, it is still necessary, as conventionally, to try and ensure that the respective optical writing means are each aligned properly with respect to a respective guide. As is explained in the present application, the use of the claimed structure permits one to adopt an approach in which the shape (for example) of the respective optical writing means effects the desired proper alignment upon the units being stacked on, and in contact with, each other.

For at least this reason, Applicant submits that Claim 1 is clearly allowable over *Nakazato '820*.

Even if *Obu* is deemed to show a direct stacking of boxes of some kind, those boxes are not optical boxes including a light source, deflecting means, and a lens. *Obu* does not in fact disclose an optical box stacked directly on and in contact with another optical box, as recited in Claim 1. Moreover, nothing has been found, or pointed out, in either document that would have provided one of merely ordinary skill in the art to apply a direct-stacking arrangement of optical boxes like those of *Nakazato '820*.

Therefore, Claim 1 is also deemed to be clearly allowable over *Nakazato* '820 and *Obu*, taken separately or in any proper combination (if any such is possible).

A review of the other art of record has failed to reveal anything which, in Applicant's opinion, would remedy the deficiencies of the art discussed above, as references against independent Claim 1, and that claim is therefore believed patentable over the art of record.

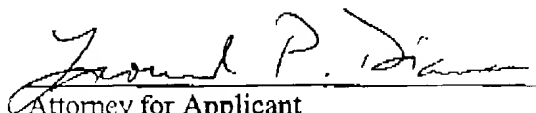
The other claims in this application are each dependent from independent Claim 1, and are therefore believed patentable for the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

This Amendment After Final Action is believed clearly to place this application in condition for allowance and, therefore, its entry is believed proper under 37 C.F.R. § 1.116. In any event, however, entry of this Amendment After Final Action, as an earnest effort to advance prosecution and reduce the number of issues, is respectfully requested. Should the Examiner believe that issues remain outstanding, it is respectfully requested that the Examiner contact Applicant's undersigned attorney in an effort to resolve such issues and advance the case to issue.

In view of the foregoing amendments and remarks, Applicant respectfully requests favorable reconsideration and early passage to issue of the present application.

Applicant's undersigned attorney may be reached in our New York office by telephone at (212) 218-2100. All correspondence should continue to be directed to our below listed address.

Respectfully submitted,



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